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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON PORTLAND DIVISION

NT'S MOTION FOR F TIME TO FILE

CERTIFICATION OF COMPLIANCE WITH LR 7-1

Pursuant to LR 7-1, Defendant certifies that they conferred with opposing counsel regarding this Motion for Extension of time, and that it was not granted. Plaintiff's counsel did not respond to either a written or verbal request.

MOTION

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and 4(d)(3), Defendant requests that the court grant an extension of 46 days to the May 16th, 2022 deadline to answer to Plaintiff's Complaint ECF No. 1, moving it to July 1st, 2022.

Defendant makes this request for good cause and not to delay these proceedings. Defendant seeks this extension to allow all Defendants the ability to respond to this complaint at the same time. Defendant makes this request in light of Defendants Bendebury and DeLay waiving service of process and thereby having 60 days from May 2nd to respond to the complaint. However, Defendant Biospintronics LLC - whose sole members and owners are Defendants Bendebury and DeLay - has already been served and is required to respond by May 16th. Granting this motion would allow all Defendants to file a single thorough and focused response at the extended deadline.

Defendant does not anticipate seeing any further extension. For this reason, Defendant respectfully requests a uniform response deadline of July 1st, 2022 for all Defendants, 46 days from the current May 16th deadline.

DATED this 9th day of May, 2022

Respectfully submitted,

By: s/ Anastasia Bendebury Anastasia Bendebury, pro se % Biospintronics LLC 5305 River Rd N Ste. B

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